

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:

CC HILLCREST LLC

Debtor

Case No. 22-31362-SWE-11

Chapter 11

HILLCREST UNION, KENNETH D. MIHM,  
RODERICK WILLIAMS, and  
ANDRE DEON MCGILVERY,

Movants

v.

CC HILLCREST, LLC,

Respondent

HEARING DATE:  
September 28, 2022

DATE: Time  
1:30 P.M.

**DECLARATION OF KAREN CHATMON**

I, Karen Chatmon, am over the age of eighteen and understand the obligations of an oath.  
Being duly sworn, I hereby state the following:

1. I reside at 2005 Hillcrest St #2016 Mesquite TX, 75149 and I have lived there since before it was purchased by the current owner.
2. I receive housing assistance in the form of a Section 8 voucher through Dallas County. My unit did not passed the Section 8 inspection this year. If the repairs are not made to my unit, I am at risk of losing my voucher.
3. I am up to date on rent.

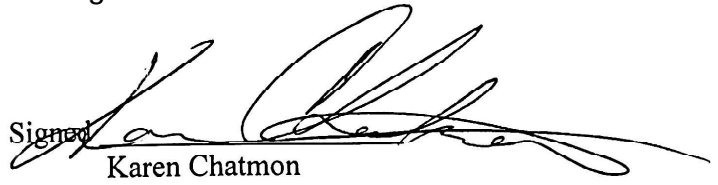
4. I am a member of the Hillcrest Union.
5. In May of 2022, I joined the Hillcrest Union. I wanted to join because there are residents going through the same things as myself and a group is more powerful together than alone when fighting to help each other.
6. To participate in the Union, I attend the Union meetings and talk to my neighbors about what's going on and discuss what to do about this situation.
7. Through union activities, I have spoken with and met several tenants of Hillcrest Apartments and have spoken with them about the health and safety issues that tenants are facing at Hillcrest Apartments. Many of us have repair issues – like mold, broken air conditioning, insufficient hot water, holes in the wall, and pest infestations.
8. As part of the Union, I have also attended public meetings and protested about the conditions at Hillcrest Apartments.
9. Some of the common issues that tenants reported were mold infestations (particularly in air ducts), sewage leakage, no working air conditioning, vermin infestations, and plumbing problems.
10. Many tenants also have problems dealing with management to get the repairs made or get accurate information about what is happening at the property.
11. For example, in the past, I and other tenants have been told we could not get alternate accommodations at the motel, even though we were entitled to them.
12. Additionally, it is common for maintenance to say they have made repairs when they have not actually fixed the problems.
13. Since the current owner purchased Hillcrest Apartments, I have made multiple repair requests regarding health and safety violations that were (and are) present in my apartment. Attached here as Exhibit A are work orders that I submitted in June of 2022.
14. The owners have not timely or sufficiently responded to all of those requests. Some of them got fixed, some were ignored, and some were half-fixed.

15. My apartment regularly became uncomfortably hot over the summer. Attached is a picture of a 24 hour thermometer taken around 5pm on September 19<sup>th</sup>, 2022, showing the 24 hour high temperature as 89.8 degrees Fahrenheit. (Exhibit B)
16. Attached here as Exhibit C are photos of the mold in and around my air ducts and air vents. These photos were taken on September 19, 2022.
17. Attached here as Exhibit D are photos of the mold on my carpet, flooring, walls, and ceiling. These photos were taken on September 19, 2022.
18. Attached here as Exhibit E is a photo of the broken floorboard on my balcony. This photo was taken on September 19, 2022.
19. I have been dealing with family medical emergencies and it's been difficult to keep up with repair requests. Plus, I have filed so many repair requests that have been ignored, so it seems pointless.
20. My most recent repair request was sent by certified mail in mid-July, before I left to bury my sister. Right before I left, my air conditioning stopped blowing cold air. The temperature in my apartment was over 85 degrees.
21. I have used the hotel accommodations three times. I was told to leave the hotel because all of the health and safety issues had been resolved, but they aren't.
22. I have not gone back to the hotel, even though I have health and safety problems in my apartment, like mold, because I was told that I would not be allowed back.
23. I am on a limited budget. I cannot afford to move. I cannot afford the cost of moving – like moving costs, application fees, and security deposits. There are very few affordable apartments in this area. There are very few landlords that will take Section 8 vouchers in the area.

Having reviewed this Declaration,

I declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on September 20, 2022

Signed   
Karen Chatmon